

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

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UNITED STATES OF AMERICA

2005 JAN -7 A 9:19

VS.

U.S. DISTRICT COURT
DISTRICT OF MASS.
Crim. No. 04-30046-MAP

ALBERT INNARELLI, ET AL,
DEFENDANTS

MOTION OF DEFENDANT MICHAEL BERGDOLL
TO MODIFY CONDITIONS OF RELEASE

Now comes the defendant Michael Bergdoll and moves that the conditions of his pre-trial release restricting his travel to the Commonwealth of Massachusetts be modified so as to allow the request contained herein. The defendant seeks permission to travel to Trumbull, Connecticut on Saturday, January 8, 2005 between the hours of 7:00am and 7:00pm to assist a friend in moving some exercise equipment from Connecticut to Massachusetts. Counsel for the defendant has conferred with counsel for the government and the government does not oppose the allowance of this motion.

Wherefore the defendant respectfully that the within motion be allowed.

The Defendant
Michael Bergdoll
By his attorney

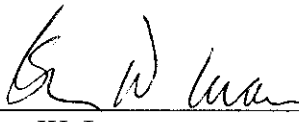


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CERTIFICATE OF SERVICE

I, Steven W. Leary, Esquire, counsel of record, hereby certify that I made service of the foregoing document by mailing a copy of same, postage prepaid, to all attorneys of record.

January 6, 2005



Steven W. Leary